

## Summary of Requirements for Accommodating Special Diets for Children in the Child and Adult Care Food Program (CACFP)

This document summarizes the requirements for meal modifications for children in the U.S. Department of Agriculture’s (USDA) [CACFP](#). These requirements apply to all CACFP child care facilities, including child care centers, at-risk afterschool care centers, emergency shelters, and family day care homes. The USDA’s nondiscrimination regulations ([7 CFR 15b](#)) and CACFP regulations ([7 CFR 226.20\(g\)](#)) require reasonable modifications for children whose disability restricts their diet, based on a written medical statement signed by a recognized medical authority.

Under the [Americans with Disabilities \(ADA\) Amendments Act of 2008](#), most physical and mental impairments will constitute a disability. This includes conditions that impair immune, digestive, neurological, and bowel functions, as well as many others. A physical or mental impairment does not need to be life threatening to constitute a disability. Limiting a major life activity is sufficient. For example, a child whose digestion is impaired by a food intolerance (such as lactose intolerance) may be a person with a disability, regardless of whether consuming the food causes the child severe distress. All disability considerations must be reviewed on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child.

CACFP facilities may choose to make optional modifications (within the CACFP meal patterns) for children whose dietary restrictions do not constitute a disability. Examples of optional modifications include requests related to religious or moral convictions, general health concerns, and personal food preferences, such as a family’s preference that their child eats a gluten-free diet or organic foods because they believe it is healthier. For information on the requirements for meal modifications, refer to the Connecticut State Department of Education’s (CSDE) guide, [Accommodating Special Diets in CACFP Child Care Programs](#), and visit the CSDE’s [Special Diets in CACFP Child Care Programs](#) webpage.

Scenario	Determination of disability	Plan on file	Examples of medical conditions <sup>1</sup>	Modification required?	Required documentation	What medical statement must include
Child is determined to have a disability (physical or mental impairment) under Section 504, and the disability restricts the child’s diet	Section 504 meeting	<ul style="list-style-type: none"> <li>504 plan and Individualized Health Care Plan (IHCP)</li> <li>May also have an Emergency Care Plan (ECP) depending on child’s medical condition</li> </ul>	Medical conditions that substantially limit a major life activity and affect the child’s diet, for example: <ul style="list-style-type: none"> <li>metabolic diseases, such as diabetes or phenylketonuria (PKU)</li> <li>food anaphylaxis (life-threatening food allergy)</li> </ul>	Yes	Medical statement signed by recognized medical authority <sup>2,3</sup>	<ul style="list-style-type: none"> <li>Information about how the child’s physical or mental impairment restricts the child’s diet</li> <li>An explanation of what must be done to accommodate the child</li> <li>The food or foods to be omitted and recommended alternatives, if appropriate</li> </ul>

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Scenario	Determination of disability	Plan on file	Examples of medical conditions <sup>1</sup>	Modification required?	Required documentation	What medical statement must include
Child is determined to have a disability (physical or mental impairment) under the Individuals with Disabilities Education Act (IDEA), and the disability restricts the child's diet	Planning and Placement Team (PPT) Meeting	<ul style="list-style-type: none"> <li>Individualized Education Program (IEP) and IHCP</li> <li>May also have an ECP depending on child's medical condition</li> </ul>	<p>Medical conditions that meet the IDEA recognized disability categories, require related services under IDEA, and affect the child's diet, for example:</p> <ul style="list-style-type: none"> <li>autism</li> <li>traumatic brain injury</li> </ul> <p>other health impairment, e.g., heart condition and diabetes</p>	Yes	Medical statement signed by recognized medical authority <sup>2, 3</sup>	<ul style="list-style-type: none"> <li>Information about how the child's physical or mental impairment restricts the child's diet</li> <li>An explanation of what must be done to accommodate the child</li> <li>The food or foods to be omitted and recommended alternatives, if appropriate</li> </ul>
<p>Child is not determined to have a disability (physical or mental impairment) under Section 504 or IDEA, but the child's medical condition:</p> <ul style="list-style-type: none"> <li>meets the definition of disability under the ADA Amendments Act; and</li> </ul> <p>the disability restricts the child's diet</p>	Recognized medical authority	<ul style="list-style-type: none"> <li>IHCP</li> <li>May also have an ECP depending on child's medical condition</li> </ul>	<p>Medical conditions that do not qualify for a disability under Section 504 or IDEA, but may meet the definition of disability under the ADA Amendments Act (i.e., any condition that substantially limits a child's major life activity), for example:</p> <ul style="list-style-type: none"> <li>celiac disease</li> <li>gluten intolerance</li> <li>lactose intolerance</li> <li>non-life-threatening food allergies</li> <li>obesity</li> <li>certain temporary disabilities</li> </ul> <p><b>Note:</b> Not all conditions require meal modifications for all children.</p>	Yes	Medical statement signed by recognized medical authority <sup>2</sup>	<ul style="list-style-type: none"> <li>Information about how the child's physical or mental impairment restricts the child's diet</li> <li>An explanation of what must be done to accommodate the child</li> <li>The food or foods to be omitted and recommended alternatives, if appropriate</li> </ul>

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Scenario	Determination of disability	Plan on file	Examples of medical conditions <sup>1</sup>	Modification required?	Required documentation	What medical statement must include
Personal food preferences	Not applicable	Not applicable	Not applicable	No <sup>4, 5</sup>	Not applicable	Not applicable
Vegetarianism	Not applicable	Not applicable	Not applicable	No <sup>4, 5</sup>	Not applicable	Not applicable
Religion	Not applicable	Not applicable	Not applicable	No <sup>4, 5</sup>	Not applicable	Not applicable

- <sup>1</sup> These examples of medical conditions are not all-inclusive and might not require meal modifications for all children. The determination of whether a child has a physical or mental impairment that restricts their diet must be made on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child.
- <sup>2</sup> Recognized medical authorities include physicians, physician assistants, doctors of osteopathy, and advanced practice registered nurses (APRNs). The CSDE's medical statement form, *Medical Statement for Meal Modifications in CACFP Child Care Programs*, is available in English and Spanish in the "[Documents/Forms](#)" section of the CSDE's Special Diets in CACFP Child Care Programs webpage.
- <sup>3</sup> CACFP facilities are not required to obtain a separate medical statement if the child has an IEP or 504 plan that includes the same information required by the USDA, or if the required information is obtained during the development or review of the IEP or 504 plan.
- <sup>4</sup> CACFP facilities are not required to make meal modifications for children whose dietary restrictions are based on individual food preferences that are not related to a disability, such as general health concerns and religious, ethnic, and moral reasons. CACFP facilities may choose to make these optional modifications on a case-by-case basis. All optional meal modifications must comply with the CACFP meal patterns. For more information, visit the CSDE's [Meal Patterns for CACFP Child Care Programs](#) webpage.
- <sup>5</sup> CACFP facilities may choose to offer one or more allowable milk substitutes for children whose dietary needs do not constitute a disability. The two types of allowable substitutes include: 1) lactose-free or lactose-reduced milk that meets the appropriate fat content for each age group (i.e., unflavored whole milk for age 1; unflavored low-fat (1%) milk or unflavored fat-free milk for ages 2-5; and unflavored low-fat (1%) milk, unflavored fat-free milk, or flavored fat-free milk for ages 6-12, and ages 13-18 in at-risk afterschool programs and emergency shelters); and 2) nondairy milk substitutes that meet the USDA's nutrition standards for fluid milk substitutes, such as certain brands of soy milk. Nondairy milk substitutes require a written request from a parent or guardian, but they do not require a medical statement. The written request must identify the dietary need that restricts the child's diet, and the requested allowable milk substitute. For more information, refer to the CSDE's resource, [Allowable Milk Substitutes for Children without Disabilities in the CACFP](#).

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## Resources

Accommodating Special Diets in CACFP Child Care Programs (CSDE guide):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide\\_Special\\_Diets\\_CACFP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide_Special_Diets_CACFP.pdf)

Allowable Milk Substitutes for Children without Disabilities in the CACFP (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk\\_Substitutes\\_CACFP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk_Substitutes_CACFP.pdf)

CSDE Operational Memorandum No. 2C-18 and 2H-18: Requirements for Meal Modifications in CACFP Child Care Programs:

[http://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Memos/OM2018/OM02C18\\_02H18.pdf](http://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Memos/OM2018/OM02C18_02H18.pdf)

Meal Patterns for CACFP Child Care Programs (CSDE webpage):

<http://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs>

Medical Statements for CACFP Child Care Programs (“Documents/Forms” section of CSDE’s Special Diets in CACFP Child Care Programs webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Child-Care-Programs/Documents#MedicalStatements>

Requirements for Meal Modifications in CACFP Child Care Programs (CSDE presentation):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Meal\\_Modifications\\_CACFP\\_Presentation.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Meal_Modifications_CACFP_Presentation.pdf)

Self-assessment of Child Care Practices for Special Diets in the CACFP (CSDE).

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/AssessmentSpDietCACFP.pdf>

Special Diets in CACFP Child Care Programs (CSDE webpage):

<http://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Child-Care-Programs>

USDA Memo CACFP 14-2017 and SFSP 10-2017: Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program:

<https://www.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp>

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For more information, visit the CSDE's [Special Diets in CACFP Child Care Programs](#) webpage or contact the [CACFP staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at [https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Summary\\_Chart\\_Special\\_Diets\\_CACFP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Summary_Chart_Special_Diets_CACFP.pdf).

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- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Levy Gillespie, Equal Employment Opportunity Director/Americans with Disabilities Coordinator (ADA), Connecticut State Department of Education, 450 Columbus Boulevard, Suite 505, Hartford, CT 06103, 860-807-2071, [levy.gillespie@ct.gov](mailto:levy.gillespie@ct.gov).